

HCI Comment Letter
Patrick Pezzelle


1154097 - R8 SDMS

to:
Ted Linnert
01/12/2010 10:02 AM
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Good Morning Mr. Linnert,

As you know the HCI in Libby is an group of community leaders who meet weekly to discuss issues affecting our area. As such, w2e opted to submit a comment letter regarding OU 1 and OU 2. Attached is that letter. All the people whose names appear have agreed to sign the letter. We will send you a hard copy as soon as all the signatures are in place.

Thank you for providing us the opportunity to provide input.
Pat

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HEALTHY COMMUNITIES INITIATIVE

The Organization of Organizations

November 30, 2009

Mr. Ted Linnert
U.S. EPA Region 8
1595 Wynkoop Street
Denver, Colorado 80202

Dear Mr. Linnert,

The Healthy Community Initiative is an informal organization of community leaders involved in economic development, education, business and health care in the Libby area. We have opted to provide our input as a group to the Proposed Plan for Public Comment regarding **Operational Unit 2** of the Libby Asbestos Superfund Site. We sincerely hope that our comments will be taken as a whole and as our individual statements.

It is our firm belief that plans provide first and foremost for the protection of human health as Libby moves towards becoming a healthy and thriving community once again. Alternatives for cleanup of Operational Unit 2 must provide for a level of flexibility that would not preclude the site from a variety of safe uses by the public and private land owners.

We reject Alternative 1 as it is disclosed in the Plan. This alternative calls for no further action and definitely is not in the best interest of residents, visitors and private property owners. Alternative 2 is only slightly better than Alternative 1 and provides for protection through the implementation of controls that limit access and land use. We do not believe this is a viable alternative as it restricts use rather than improves options for future use. Alternative 3a provides a slightly higher level of remediation but does not address the removal and disposal of contaminated soil thus requiring restricted access to sites in OU 2. We would not be supportive of Alternatives 1, 2, and 3a as they are defined in the Proposed Plan for Public Comment.

We would recommend that the EPA consider Alternatives 3b for conducting the cleanup of contamination at OU 2. This alternative seems to provide for protection of human health by removal of contaminated soils and the use of soft covers. We believe this would be an equitable solution and would support it.

Sincerely,



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Mr. Ted Linnert
U.S. EPA Region 8
1595 Wynkoop Street
Denver, Colorado 80202

Dear Mr. Linnert,

The Healthy Community Initiative is an informal organization of community leaders involved in economic development, education, business and health care in the Libby area. We have opted to provide our input as a group to the Proposed Plan for Public Comment regarding **Operational Unit 1** of the Libby Asbestos Superfund Site. We sincerely hope that our comments will be taken as a whole and as our individual statements.

It is our firm belief that plans provide first and foremost for the protection of human health as Libby moves towards becoming a healthy and thriving community once again. Since the City of Libby has not yet clearly defined the future use of the land contained in OU 1, the alternatives must provide for a level of flexibility that would not preclude the site from a variety of uses as the City makes its plans. We reject Alternative 1 as it is disclosed in the Plan. This alternative calls for no further action and definitely is not in the best interest of the City of Libby and its residents. Alternative 3a provides a higher level of protection than Alternative 1 but does not provide the flexibility of Alternatives 3b and 4a in that it would require hard cover to contain any contamination.

We would recommend that the EPA combine Alternatives 3b and 4a for conducting the cleanup of contamination at OU 1. By combining these two alternatives, protection of human health is provided for in a combination of in-place containment and removal of subsurface contamination. We believe this would be an equitable solution and would support it.